

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

JESUS RICARDO DE HOYOS

V.

C.R. ENGLAND and
DWIGHT S. GRAHAM

§
§
§
§
§

CIVIL ACTION NO. 5:15-cv-00060

DEFENDANTS, C.R. ENGLAND and DWIGHT S. GRAHAM'S
NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendants, **C.R. ENGLAND and DWIGHT S. GRAHAM**, hereby removes this action to the United States District Court for the Western District of Texas from the 341st Judicial District Court of Webb County, Texas, stating as follows:

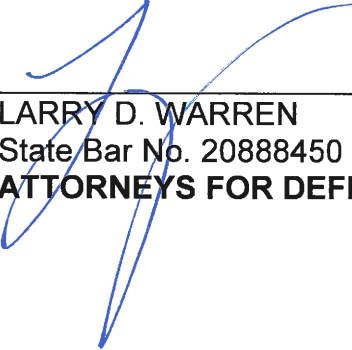
1. Plaintiff, Jesus Ricardo De Hoyos, commenced this action in the 341st Judicial District Court of Webb County, Texas, where it was given Cause No. 2015cvt000122. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant C.R. England, Inc. is a Utah Corporation and Defendant Dwight S. Graham is a resident of Pennsylvania. Further, Plaintiff claims damages for serious personal injury and is seeking damages of \$1,000,000. Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.

2. Defendants, C.R. England and Dwight S. Graham received the summons and complaint on March 10, 2015, so this removal is timely under 28 U.S.C. § 1446(b).

3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.
4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 341st Judicial District Court of Webb County, Texas.
5. Defendants C.R. England and Dwight S. Graham consents to the removal.

Dated: March 31st, 2015

Respectfully submitted,



LARRY D. WARREN
State Bar No. 20888450
ATTORNEYS FOR DEFENDANTS

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of March 2015, the foregoing was filed with the Clerk of Court using the CM/ECF system, and was served on counsel:

E-Filing Notification System:

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